

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	No. 21 CR 19
)	
)	Hon. Judge Seeger
DAVID FOLEY)	
)	

UNOPPOSED MOTION TO CONTINUE SENTENCING DATE

The Defendant, David Foley, by his attorneys, Nishay K. Sanan and Cece White, hereby respectfully moves this court, for a short continue of the Sentencing in this matter. Mr. Foley states as follows:

1. On November 4, 2024, Mr. Foley was convicted of 2 counts of violations of securities laws and not guilty of 8 counts of wire fraud.
2. The Court set sentencing for March 12, 2024. The PSR is due by February 26, 2025, with recommendations.
3. Counsel for Foley has a family conflict on March 12, 2025, and now needs to be out of State until the 13th of March
4. Counsel request this matter be set for the next available date that this Court has available. The only potential conflict is Counsel is on trial March 17 to 28th before Judge Kenelly.
5. Counsel has spoken to the Government, and they have no objections to this motion.
6. Post Trial Motions are still being briefed.
7. Mr. Foley asks to continue the sentencing date to a date after March 28th.
8. This motion is not brought to cause delay to the proceedings.

WHEREFORE Mr. Foley asks to continue the Sentencing date to a date after March 28, 2025.

Respectfully submitted,

/s/ Nishay K. Sanan
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Respectfully submitted,

/s/ Cece White
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